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**From:** Schulman, Michael [Schulman.Michael@epa.gov]  
**Sent:** 11/25/2020 7:12:39 PM  
**To:** Der Boghosian, Shantal [US] (ES) [Shantal.DerBoghosian@ngc.com]  
**Subject:** Re: Transmittal of Cost Billing Package for the TRW Microwave Superfund Site  
**Attachments:** OC Policy Full SF IC Methodology.pdf; FY 2018 Superfund Actual Indirect Cost Rates.pdf

Hi Shantal,

The "indirect" terminology used may be better understood as the burden applied to EPA's raw labor rate and the markup added to EPA contractor's costs. The indirect rate is set annually at the EPA HQ level. See attached for more information.

We can provide backup documentation on the invoice; however, the time to provide the backup will depend on how broad the request is. If NGC is asking for backup on everything (e.g., EPA payroll, ODCs, travel, contractors) the turn-around time will likely be greater than 3 months due to an unfilled retirement at the EPA. If NGC is asking for just EPA contractor's backup (e.g. APTIM, Artic) and their monthly status reports, we could get that to you in about a month. Note, if NGC wants to delay payment to review the invoice and request backup this may require NGC to place the invoiced amount in an escrow account and we should follow up together more on this.

I hope this helps.  
Michael

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**Michael Schulman**  
Remedial Project Manager  
US EPA, Region 9, SFD-7-1  
75 Hawthorne St.  
San Francisco, CA 94105  
415-972-3064 (o)

On Nov 25, 2020, at 8:52 AM, Der Boghosian, Shantal [US] (ES) <[Shantal.DerBoghosian@ngc.com](mailto:Shantal.DerBoghosian@ngc.com)> wrote:

Good morning!

I am reviewing the invoice and have questions regarding the indirect costs. Can you explain what those are and is there backup documentation you can provide? Maybe a rate sheet that shows how indirect rates are established?

**SHANTAL DER BOGHOSIAN** | Environmental Remediation Project Manager, PMP, MS, EIT  
Northrop Grumman | Enterprise Services  
O: 310-332-7612 | C: 424-397-7614 | [shantal.derboghosian@ngc.com](mailto:shantal.derboghosian@ngc.com)

<image002.png>

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**From:** Henning, Loren <[Henning.Loren@epa.gov](mailto:Henning.Loren@epa.gov)>  
**Sent:** Tuesday, November 24, 2020 2:47 PM  
**To:** Der Boghosian, Shantal [US] (ES) <[Shantal.DerBoghosian@ngc.com](mailto:Shantal.DerBoghosian@ngc.com)>  
**Cc:** Ariatti, Robert J [US] (CO) <[robert.ariatti@ngc.com](mailto:robert.ariatti@ngc.com)>; Schulman, Michael

<Schulman.Michael@epa.gov>; Reynolds, Rebekah <Reynolds.Rebekah@epa.gov>; Brown, GwenL  
<Brown.GwenL@epa.gov>; Tran, Peter <tran.peter@epa.gov>

**Subject:** EXT :Transmittal of Cost Billing Package for the TRW Microwave Superfund Site

Dear Ms. Der Boghosian,

Attached is the cost billing package the TRW site, including instructions for electronic payment should you choose to use that payment method. Please contact Craig Steffen of the EPA Finance Center if you have questions about Pay.gov. He can be reached at (513) 487-2091.

Regards,

Loren Henning, Manager  
CERCLA Enforcement Office  
Superfund and Emergency Management Division  
US EPA Region 9  
(415) 972-3164 phone  
(415) 699-1941 cell

<TRW Microwave SFD Site SSID 09K4.pdf>  
<ATPFile\_CE6EEE48-3663-4393-AEBB-9A55F7C1723F.token>